



**SCHOTT, BUBLITZ  
& ENGEL s. c.**  
ATTORNEYS AT LAW

(262) 827-1700

March 12, 2020

Mr. James A. Friedman  
Godfrey & Kahn, S.C.  
One E. Main St., Ste. 500  
Madison, WI 53703-3300

Mr. Lee Levine  
Mr. Matthew E. Kelley  
Ballard Spahr LLP  
1909 K Street, NW, Ste. 1200  
Washington, D.C. 20006-1157

**Re: Colborn v. Netflix, et al.**

Dear Counsel:

We are in receipt of the memorandum in support of Netflix, Inc.'s motion to dismiss Plaintiff's Second Amended Complaint. Within the body of your memorandum and declaration of Matthew Kelley, Netflix introduced considerable amounts of evidence not previously in the record and beyond our pleadings and allegations in the complaint.

To date, no discovery has been produced. As I have previously discussed by telephone with James and Leita, we do not see any reason that discovery should not proceed at this point, particularly as any pending motions likely will not be decided for many additional months. We are therefore requesting that you advise when you are available for a Rule 26(f) conference as soon as possible.

We are enclosing additional discovery requests that pertain to the issues raised by the Defendants. We are also requesting you answer the first set of discovery, which has been outstanding for nearly a year, within thirty (30) days.

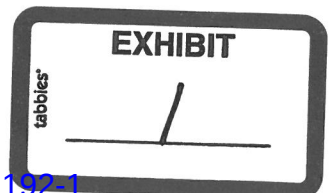
Sincerely,

SCHOTT, BUBLITZ & ENGEL s.c.

April Rockstead Barker

ARB/alr  
Enclosure

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION

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ANDREW L. COLBORN,  
Plaintiff

NETFLIX, INC.,  
CHROME MEDIA, LLC, f/k/a  
SYNTHESIS FILMS, LLC,  
LAURA RICCIARDI, and  
MOIRA DEMOS,

Case No. 19-CV-484

Defendants.

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**PLAINTIFF'S SECOND REQUEST FOR PRODUCTION OF  
DOCUMENTS TO NETFLIX, INC.**

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TO: Netflix, Inc.

Andrew L. Colborn, by and through his attorneys, the Law Firm of Conway, Olejniczak & Jerry, S.C., hereby requests pursuant to Wis. Stat. § 804.09, that you produce all documents, reports, records and other similar or related materials referenced below, which are either in your possession or readily available to you. These documents, reports, records and other similar or related materials shall be produced at the offices of the Law Firm of Conway, Olejniczak & Jerry, S.C., 231 South Adams Street, P.O. Box 23200, Green Bay, Wisconsin 54305, within thirty (30) days of service of this Request.


**DOCUMENT PRODUCTION REQUESTS**

DOCUMENT REQUEST NO. 1: A copy of all raw footage that occurred during the trial of Steven Avery in Manitowoc, Case No. 2005 CF 381, that includes Andrew Colborn.

DOCUMENT REQUEST NO. 2: Please produce a copy of all raw footage from the trial of Steven Avery in Manitowoc, Case No. 2005 CF 381.

Dated this 12<sup>th</sup> day of March, 2020.

SCHOTT, BUBLITZ & ENGEL S.C.

By: 

April Rockstead Barker

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